



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

November 17, 2003

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Sunnybrook RV, Inc. / T039-16458-00444

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and

- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

SunnyBrook RV, Inc.
201 14th Street
Middlebury, Indiana 46540

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-16458-00444	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: November 17, 2003 Expiration Date: November 17, 2008

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary towable recreational vehicle manufacturing source.

Responsible Official:	President
Source Address:	201 14 th Street, Middlebury, IN 46540
Mailing Address:	201 14 th Street, Middlebury, IN 46540
General Source Phone Number:	(574) 825-5250
SIC Code:	3792
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) fiberglass insulation panel gluing operation consisting of four (4) glue stations identified as FUG26, FUG39, FUG40 and FUG44, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an air atomized spray application method, and exhausting inside the building.
- (b) Hand application of miscellaneous sealants and adhesives plant-wide identified as (FUG50, FUG52 and FUG53), exclusive of the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44), during product carpeting, paneling, and plastic pipe, linoleum and roof installation, and exhausting inside the building.
- (c) Hand application of mineral spirits for cleaning purposes plant-wide, identified as FUG51 and SB-070, and exhausting inside the building.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Other categories with emissions below insignificant thresholds (i.e. less than 3 pound per hour VOC and less than 5 pounds per hour Particulate Matter).
 - (1) One (1) insulation panel gluing operation, consisting of four (4) glue stations identified as SB-064 through SB-067, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless application system and exhausting inside the building.
 - (2) Two (2) manual application processes of sealants and adhesives identified as SB-069 and SB-071, for plant wide fabrication processes and exhausting inside the

building.

- (3) One (1) pre-finished wood cabinet assembly and stain touch up operation, consisting of one (1) mobile stain touch up process identified as SB-068, rated at 0.024 gallons per hour, with utilizing air atomized spray application method and exhausting inside the building.
- (4) One (1) pre-finished wood cabinet assembly and stain touch up operation, consisting of five (5) stain touch up stations identified as FUG45, FUG46, FUG47, FUG48 and FUG49, cumulatively rated at 0.02 gallons of stain per hour, with each station utilizing an air atomized spray application method and exhausting inside the building.
- (5) Welding operations with Particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day each unit. (Two (2) stick type welders, identified as FUG41 and FUG42). [326 IAC 6-3-2]
- (6) Two (2) woodworking operations each with Particulate emissions less than five (5) pounds per hour or twenty-five (25) pound per day each unit, consisting of: [326 IAC 6-3-2]
 - (i) One (1) Cut off saw, one (1) 10" Chop saw, one (1) Table saw, one (1) Edge Sander and one (1) 7' x 7' Panel saw, with combined maximum process weight rate of 445 pounds per hour and each exhausting through a baghouse inside the building.
 - (ii) One (1) pin router, table saw and panel saw, each with particulate matter controlled by a portable dust collector, one (1) cutoff saw and nine (9) hand router systems, each with particulate matter controlled by a portable vacuum dust collector; three (3) cut off saws, three (3) band saws, eight (8) chop saws, one (1) table saw, two (2) edge sanders, one (1) bench grinder, two (2) hand buffers, one (1) drill press, one (1) mitre saw, twenty-five (25) portable hand held routers, five (5) hand held air sanders, and five (5) hand drills, with combined maximum process weight rate of 1104 pounds per hour.
- (7) One (1) Metal Coating Operation consisting of hand and aerosol spray application of miscellaneous coatings to metal trailer frames and piping.
- (b) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Telephone No.: 574-245-4870 (Northern Regional Office)
Facsimile No.: 574-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.³

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.14 **Deviations from Permit Requirements and Conditions** [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 **Permit Modification, Reopening, Revocation and Reissuance, or Termination**
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 **Permit Renewal** [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4.

Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, , upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, , takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, , any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of

the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have

access to and copy any records that must be kept under the conditions of this permit;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, , if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.

[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

**C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for

motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One fiberglass insulation panel gluing operation consisting of four (4) glue stations identified as FUG26, FUG39, FUG40 and FUG44, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an air atomized spray application method, and exhausting inside the building.
- (b) Hand application of miscellaneous sealants and adhesives plant-wide identified as (FUG50, FUG52 and FUG53), exclusive of the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44), during product carpeting, paneling, and plastic pipe, linoleum and roof installation, and exhausting inside the building.
- (c) Hand application of mineral spirits for cleaning purposes plant-wide, identified as FUG51 and SB-070, and exhausting inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for the Sealant & Adhesive Usage (FUG50, FUG52 and FUG53) is as follows:

- (a) Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage.
- (b) Perform proper equipment clean-up and maintenance. Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;
- (c) Any change or modification to the the plant-wide usage of Sealants & Adhesives (FUG50, FUG52 and FUG53), exclusive of the fiberglass insulation panel gluing operation that may increase the PTE of VOC to more than 25 tons per year, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.
- (d) The equipment and work practice standards listed in (a) through (c) shall be used at all times of facility operations.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Any change or modification to the Glue Operation (FUG26, FUG39, FUG40 and FUG44) that may increase the PTE of VOC to more than 25 tons per year from each, shall be subject to the requirements of 326 IAC 8-1-6 and must be approved by the Office of Air Quality before such change can occur.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no compliance monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Other categories with emissions below insignificant thresholds (i.e. less than 3 pound per hour VOC and less than 5 pounds per hour Particulate Matter).
- (1) One (1) insulation panel gluing operation, consisting of four (4) glue stations identified as SB-064 through SB-067, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless application system and exhausting inside the building.
 - (2) Two (2) manual application processes of sealants and adhesives identified as SB-069 and SB-071, for plant wide fabrication processes and exhausting inside the building.
 - (3) One (1) pre-finished wood cabinet assembly and stain touch up operation, consisting of one (1) mobile stain touch up process identified as SB-068, rated at 0.024 gallons per hour, with utilizing air atomized spray application method and exhausting inside the building.
 - (4) One (1) pre-finished wood cabinet assembly and stain touch up operation, consisting of five (5) stain touch up stations identified as FUG45, FUG46, FUG47, FUG48 and FUG49, cumulatively rated at 0.02 gallons of stain per hour, with each station utilizing an air atomized spray application method and exhausting inside the building.
 - (5) Welding operations with Particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day each unit. (Two (2) stick type welders, identified as FUG41 and FUG42). [326 IAC 6-3-2]
 - (6) Two (2) woodworking operations each with Particulate emissions less than five (5) pounds per hour or twenty-five (25) pound per day each unit, consisting of :
 - (i) One (1) Cut off saw, one (1) 10" Chop saw, one (1) Table saw, one (1) Edge Sander and one (1) 7' x 7' Panel saw, with combined maximum process weight rate of 445 pounds per hour and each exhausting through a baghouse inside the building.
 - (ii) One (1) pin router, table saw and panel saw, each with particulate matter controlled by a portable dust collector, one (1) cutoff saw and nine (9) hand router systems, each with particulate matter controlled by a portable vacuum dust collector; three (3) cut off saws, three (3) band saws, eight (8) chop saws, one (1) table saw, two (2) edge sanders, one (1) bench grinder, two (2) hand buffers, one (1) drill press, one (1) mitre saw, twenty-five (25) portable hand held routers, five (5) hand held air sanders, and five (5) hand drills, with combined maximum process weight rate of 1104 pounds per hour.
 - (7) One (1) Metal Coating Operation consisting of hand and aerosol spray application of miscellaneous coatings to metal trailer frames and piping.
- (b) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Wood Furniture NESHAP [40 CFR Part 63, Subpart JJ] [326 IAC 20-14]

- (a) The pre-finished wood cabinet assembly and stain touch up operations (identified as FUG45, FUG46, FUG47, FUG48, FUG49, FUG54, and SB-068) are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ).
- (b) Pursuant to 40 CFR §63.801(a), *Definitions*, the source shall qualify as an incidental furniture manufacturer. Pursuant to 40 CFR §63.800(a), *Applicability*, any change or modification to the pre-finished wood cabinet assembly and stain touch up operations (identified as FUG45, FUG46, FUG47, FUG48, FUG49, FUG54, and SB-068) that may increase the usage of finishing material or adhesive to more than 100 gallons per month, shall obtain prior approval from IDEM, OAQ before such change can take place.

Compliance with this condition shall make all other provisions and requirements of Subpart JJ not applicable to the source.

D.2.2 Miscellaneous Metal Parts and Products Surface Coating [40 CFR Part 63, Subpart Mmmm]

The United States Environmental Protection Agency (EPA) has established the *Miscellaneous Metal Parts and Products Surface Coating* source category as requiring hazardous air pollutant control. The EPA proposed such requirements on August 13, 2002. As proposed, this rule will be applicable to *Miscellaneous Metal Parts and Products Surface Coating* operations at a major source of hazardous air pollutants (HAPs), as defined at 40 CFR Part 63.2.

This source is a major source of HAPs and shall be subject to the rule as proposed if the usage of any coating is greater than 50 gallons per year, and total coatings is more than 250 gallons per year. The source shall evaluate rule applicability upon final promulgation and comply with all applicable requirements.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the manual application process SB-069 which coats metal parts shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm or air dried coatings. Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (b) Any change or modification which may increase actual VOC usage for the Metal Coating Operation consisting of hand and aerosol spray application of miscellaneous coatings to metal trailer frames and piping to greater than fifteen (15) pounds per day, before add-on controls, shall require IDEM, OAQ's prior approval before such change can take place.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Any change or modification which may increase actual VOC usage for the pre-finished wood cabinet assembly and stain touch up operations (identified as FUG45, FUG46, FUG47, FUG48, FUG49, FUG54, and SB-068) to greater than fifteen (15) pounds per day before add-on controls, excluding the use of up to 10 gallons of coating per day for touch-up and repair, shall require IDEM, OAQ's prior approval before such change can take place.

D.2.5 Volatile Organic Compounds [326 IAC 8-1-6]

Any change or modification to the insulation panel gluing operation (SB-064 through SB-067) and other application processes (SB-070 and SB-071) that may increase the PTE of VOC from any of the units to more than 25 tons per year, shall obtain prior approval from IDEM, OAQ and shall be

subject to the requirements of 326 IAC 8-1-6.

D.2.6 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operation shall not exceed 3.45 pounds per hour when operating at a process weight rate of 1549 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

D.2.7 Particulate [326 IAC 6-3-2(d)]

Any change or modification which may increase the coating application rate to greater than five (5) gallons per day from any the Stain Touch Up surface coating operations (FUG45 through FUG49, and SB-068) shall require a control device, pursuant to 326 IAC 6-3-2(d).

Compliance Determination Requirements

D.2.8 Particulate Matter (PM)

In order to comply with Condition D.2.6, the baghouse for PM and PM10 control shall be in operation at all times that the woodworking operation is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency

and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 through D.2.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1 through D.2.5. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The cleanup solvent usage for each day;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of daily coating usage at Stain Touch Up surface coating operations (FUG45 through FUG49, and SB-068).
- (c) To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: SunnyBrook RV, Inc.
Source Address: 201 14th Street, Middlebury, IN 46540
Mailing Address: 201 14th Street, Middlebury, IN 46540
Part 70 Permit No.: T039-16458-00444

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

? Annual Compliance Certification Letter

? Test Result (specify) _____

? Report (specify) _____

? Notification (specify) _____

? Affidavit (specify) _____

? Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: SunnyBrook RV, Inc.
Source Address: 201 14th Street, Middlebury, IN 46540
Mailing Address: 201 14th Street, Middlebury, IN 46540
Part 70 Permit No.: T039-16458-00444

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p>? This is an emergency as defined in 326 IAC 2-7-1(12)</p> <p>? The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</p> <p>? The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</p> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: SunnyBrook RV, Inc.
Source Address: 201 14th Street, Middlebury, IN 46540
Mailing Address: 201 14th Street, Middlebury, IN 46540
Part 70 Permit No.: T039-16458-00444

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name: SunnyBrook RV, Inc.
Source Location: 201 14th Street, Middlebury, IN 46540
County: Elkhart
SIC Code: 3792
Operation Permit No.: T039-16458-00444
Permit Reviewer: Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from SunnyBrook RV, Inc. relating to the operation of a stationary towable recreational vehicle manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) fiberglass insulation panel gluing operation consisting of four (4) glue stations identified as FUG26, FUG39, FUG40 and FUG44, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an air atomized spray application method, and exhausting inside the building.
- (b) Hand application of miscellaneous sealants and adhesives plant-wide identified as (FUG50, FUG52 and FUG53), exclusive of the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44), during product carpeting, paneling, and plastic pipe, linoleum and roof installation, and exhausting inside the building.
- (c) Hand application of mineral spirits for cleaning purposes plant-wide, identified as FUG51 and SB-070, and exhausting inside the building.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Other categories with emissions below insignificant thresholds (i.e. less than 3 pound per hour VOC and less than 5 pounds per hour Particulate Matter).
 - (1) One (1) insulation panel gluing operation, consisting of four (4) glue stations identified as SB-064 through SB-067, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless application system and exhausting inside the building.
 - (2) Two (2) manual application processes of sealants and adhesives identified as SB-069 and SB-071, for plant wide fabrication processes and exhausting inside the building.

- (3) One (1) pre-finished wood cabinet assembly and stain touch up operation, consisting of one (1) mobile stain touch up process identified as SB-068, rated at 0.024 gallons per hour, with utilizing air atomized spray application method and exhausting inside the building.
- (4) One (1) pre-finished wood cabinet assembly and stain touch up operation, consisting of five (5) stain touch up stations identified as FUG45, FUG46, FUG47, FUG48 and FUG49, cumulatively rated at 0.02 gallons of stain per hour, with each station utilizing an air atomized spray application method and exhausting inside the building.
- (5) Welding operations with Particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day each unit. (Two (2) stick type welders, identified as FUG41 and FUG42). [326 IAC 6-3-2]
- (6) Two (2) woodworking operations each with Particulate emissions less than five (5) pounds per hour or twenty-five (25) pound per day each unit, consisting of: [326 IAC 6-3-2]
 - (i) One (1) Cut off saw, one (1) 10" Chop saw, one (1) Table saw, one (1) Edge Sander and one (1) 7' x 7' Panel saw, with combined maximum process weight rate of 445 pounds per hour and each exhausting through a baghouse inside the building.
 - (ii) One (1) pin router, table saw and panel saw, each with particulate matter controlled by a portable dust collector, one (1) cutoff saw and nine (9) hand router systems, each with particulate matter controlled by a portable vacuum dust collector; three (3) cut off saws, three (3) band saws, eight (8) chop saws, one (1) table saw, two (2) edge sanders, one (1) bench grinder, two (2) hand buffers, one (1) drill press, one (1) mitre saw, twenty-five (25) portable hand held routers, five (5) hand held air sanders, and five (5) hand drills, with combined maximum process weight rate of 1104 pounds per hour.
- (7) One (1) Metal Coating Operation consisting of hand and aerosol spray application of miscellaneous coatings to metal trailer frames and piping.
- (8) Usage of materials with VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day. (Glass primer, glass cleaner, dry lubricant, silicone lubricant, and lacquer thinner).
- (b) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
 - (1) One (1) natural gas fired heater, identified as SB-023, with a maximum heat input rate of 0.4 MMBtu/hr.
 - (2) One (1) natural gas fired heater, identified as SB-016, with a maximum heat input

- rate of 0.08 MMBtu/hr.
- (3) Six (6) natural gas fired heaters, identified as SB-017 through SB-022, each with a maximum heat input rate of 0.16 MMBtu/hr.
 - (4) Five (5) natural gas fired heaters, identified as SV 25 through SV 29 and each with a maximum heat input rate of 0.4 MMBtu/hr.
 - (f) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Part 70 operating permit 039-7803-00444, issued on October 12, 1998.
- (a) First Administrative Amendment No.: 039-10237-00444, issued on April 12, 1999.
- (b) First Reopening No.: 039-13277-00444, issued on January 28, 2002.
- (d) First Significant Source Modification 039-16779-00444, issued on March 3, 2003.
- (e) First Significant Permit Modification 039-16865-00444, issued on March 19, 2003.

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) Part 70 operating 039-7803-00444, issued on October 12, 1998.

Condition: D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Reason Removed: Condition D.1.1 contains BACT requirements for fiberglass insulation panel gluing operation identified as FUG26, FUG39, FUG40 and FUG44, and Hand application of miscellaneous sealants and adhesives plant-wide identified as FUG50, FUG52 and FUG53. During this Title V permit renewal review process, it has been determined that the source has changed some of the coatings used at fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40 and FUG44) resulting in less than 25 tons per year PTE of VOCs. Based on this updated information, this facility is no longer subject to the requirements of rule 326 IAC 8-1-6 (BACT). However, the hand application of miscellaneous sealants and adhesives plant-wide (FUG50, FUG52 and FUG53) is still subject to BACT with VOC PTE of well above 25 tons per year and shall continue to be subject to the original BACT requirements. Therefore, condition D.1.1 has been revised as follows to incorporate this change.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) is as follows:

- ~~(a) Utilize air atomized spray equipment for adhesives application at the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44);~~

- (ba) Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage; ~~including correct positioning of applicator nozzles when applying adhesives at FUG26, FUG39, FUG40, and FUG44 to limit overspray;~~
- (cb) Perform proper equipment clean-up and maintenance, ~~including containment of solvent sprayed from FUG26, FUG39, FUG40 and FUG44 applicators during equipment cleanup.~~ Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;
- (dc) ~~Limit total VOC input to each facility as follows:~~
- (1) ~~The total VOC input to the gluing operation, including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to less than 28.4 tons per twelve (12) consecutive month period.~~
- (2) ~~The total volatile organic compounds (VOC) input to the plant-wide usage of sealants and adhesives, exclusive of the fiberglass insulation panel gluing operation, shall be limited to less than 29.4 tons per twelve (12) consecutive month period.~~ **Any change or modification to the the plant-wide usage of Sealants & Adhesives (FUG50, FUG52 and FUG53), exclusive of the fiberglass insulation panel gluing operation that may increase the PTE of VOC to more than 25 tons per year, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.**
- (ed) The equipment and work practice standards listed in (a) through (dc) shall be used at all times of facility operations.

- (b) First Significant Source Modification No. 039-16779-00444, issued on March 3, 2003

Condition: D.2.5 Particulate-Matter (PM) [40 CFR 52 Subpart P]
Pursuant to 40 CFR 52 Subpart P, the particulate matter emissions from the surface coating facilities SB-064 through SB-068 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Reason Removed: Glue Operation (SB-064 through SB-068) have been re-evaluated during this Part 70 Permit renewal process and it has been determined that this Glue Operation does not emit particulates. The adhesive is characterized as a stringy material of large "droplet" size, which is not considered particulate per 326 IAC 6-3-1.5(3). The application of adhesive is not considered as surface coating, pursuant to 326 IAC 6-3-1.5(5), since there is no potential to emit particulate; therefore 326 IAC 6-3 does not apply to the Glue operation (SB-064 through SB-068).

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on November 12, 2003. Additional information was received on July 30, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (ten (10) pages).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous Title V.

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 100 and less than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	Potential Emissions (tons/year)
xylene	greater than 10
toluene	less than 10
ethyl benzene	less than 10
hexane	greater than 10
cumene	less than 10
glycol ethers	less than 10
methanol	less than 10
methyl ethyl ketone	less than 10
TOTAL	greater than 25

- (a) The unrestricted potential emissions (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The unrestricted potential emissions (as defined in 326 IAC 2-1.1-1(16)) of any single HAP

is equal to or greater than ten (10) tons per year and the unrestricted potential emissions (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM-10	1.00
SO ₂	0.00
VOC	26.00
CO	1.00
NO _x	1.00
HAP (specify)	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit. The source's potential to emit is based on the emission units included in the original Part 70 Permit (T039-7803-00444; issued on October 12, 1998) and the First Significant Source Modification (039-16779-00444, issued on March 3, 2003).

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Glue Operation (FUG26, FUG 39, FUG40 and FUG44)	--	--	--	22.89	--	--	5.78 (single) 11.56 (total)
Sealant & Adhesive Usage (FUG50, FUG52, FUG53)	--	--	--	29.41	--	--	6.32 (single) 16.58 (total)
Cleaning Solvent Usage (FUG51 and SB-070)	--	--	--	28.45	--	--	--
Stain Touch Up (FUG45 through FUG49) *	0.05	0.05	--	0.06	--	--	0.06 (single) 0.06 (single)
Stain Touch Up (SB-068) *	0.09	0.09	--	0.08	--	--	0.05 (single) 0.05 (total)
Glue Operation (SB-064 through SB-067)	--	--	--	13.61	--	--	6.81 (single) 13.62 (total)
Woodworking Operation *	1.16	1.16	--	--	--	--	--
Welding *	0.01	0.01	--	--	--	--	negl.
Natural Gas Combustion *	0.05	0.20	0.02	0.14	2.19	2.60	0.046 (single) 0.05 (total)
Metal Coating *	--	--	--	0.98	--	--	0.20 (single) 0.20 (total)
Miscellaneous Clean Up Operations and Materials Containing VOCs*	--	--	--	8.18	--	--	2.46 (single) 2.50 (total)

SB-069 (Sealant & Adhesive Application) *	--	--	--	6.18	--	--	5.25 (single) 6.19 (total)
SB-071 (Sealant & Adhesive Application) *	--	--	--	4.98	--	--	4.98 (single) 4.98 (total)
Total Emissions	1.36	1.51	0.02	114.94	2.19	2.60	15.91 (single) 55.80 (total)

Notes:

* Insignificant Activity

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Elkhart County has been classified as attainment or unclassifiable for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance

of Part 70 permits.

- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

- (b) The pre-finished wood cabinet assembly and stain touch up operations (identified as FUG45 through FUG49 and SB-068) are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for source categories, 326 IAC 20-14, (40 CFR 63, Subpart JJ), National Emission Standards for Wood Furniture Manufacturing Operations, due to its wood cabinet assembly process and because the plant is a major source of hazardous air pollutants (HAPs). A major source of HAPs is one that has the potential to emit any single HAP in amounts at, or greater than 10 tons per year or all HAPs combined in amounts at, or greater than 25 tons per year. Although this source is subject to Subpart JJ, it is considered as an *incidental furniture manufacturer* (i.e., a major source that is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and that uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components), since the cabinet components are pre-finished by the supplier. As such, and pursuant to 40 CFR 63.800 (Applicability), the source is not subject to any of the rule requirements other than the maintenance of purchase or usage records demonstrating that finishing material (i.e., touch-up stain) and adhesive usages are each less than 100 gallons per month for the cabinet assembly process.

- (c) The insignificant activities identified as "a petroleum fuel, other than gasoline, dispensing facility with storage capacity less than or equal to 10,500 gallons" and "a gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons" are not subject to the New Source Performance Standards, 326 IAC 12, (40 CFR Parts 60.110, 110a - 115a or 110b - 117b, as Subparts K, Ka, and Kb, respectively) since the storage capacities associated with these activities are below the minimum applicable threshold to the three rules (i.e., 40 cubic meters (10,568 gallons)).

- (d) This source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring. In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant:
 - (1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant;

- (2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and
- (3) the unit has potential to emit before controls equal to or greater than one hundred (100) tons per year.

The Glue Operations, Sealant & Adhesive Applications, Cleaning Solvent Usage and Stain Touch Up operations do not individually have the potential to emit greater than 100 tons per year of VOC. Additionally, none of these operations require the use of control device to achieve compliance with the representative emission limitations. Therefore the source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring.

- (e) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP). 326 IAC 20. (40 CFR Part 63.4680. Subpart QQQQ, National Emission Standard for Hazardous Air Pollutants: Surface Coating of Wood Building Products). Pursuant to 40 CFR Part 63.4681(c)(2), this rule does not apply to surface coating of wood furniture which is already subject to 40 CFR Part 63, Subpart JJ, including finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components. Since the two (2) Stain Touch Up operations used for touching up wood and wood products in finished cabinetry at this source are subject to 40 CFR Part 63, Subpart JJ, this source is not subject to the requirements of 40 CFR Part 63, Subpart QQQQ.
- (f) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.

The source is not subject to the proposed MACT standard (40 CFR Part 63, Subpart MMMM, Miscellaneous Metal Parts and Products Surface Coating), because section 63.3881(c)(5) of the proposed rule for the Miscellaneous Metal Parts & Products Surface Coatings indicates that this subpart will not apply to coatings used in volumes less than 189 liters (50 gallons) per year, provided that the total volume of coatings exempt under 63.3881(c)(5) does not exceed 946 liters (250 gallons) per year at the facility. Based on the information available from the source, IDEM, OAQ has determined that the Metal Coating operation at this source does not belong to the affected source category because the volume of the coatings used is less than 50 gallons per year. Therefore, the source is not required to submit a Part 2 MACT Application in accordance with 40 CFR 63.53(b) for this affected source category.

State Rule Applicability - Entire Source

There are no new state rules applicable to the entire source during this Part 70 Permit renewal review process. The applicability determination that follows is based on that conducted for original Part 70 Permit 039-7803-00444; issued on October 12, 1998.

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

The existing source was constructed after the August 7, 1977 rule applicability date. This source is not considered a major source because it is not one of the 28 listed source categories and it has the potential to emit after controls of less than 250 tons per year of any criteria pollutant. The modification done to the source in March, 2003 was minor, therefore, the source is not subject to the requirements of Prevention of Significant Deterioration (PSD).

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because no new or reconstructed facilities with a PTE of any single HAP at 10 tons per year or 25 tons per year of the combination HAPs have been installed since July 27, 1997. Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and is located in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

State Rule Applicability - Individual Facilities

There are no new state rules determined as applicable to individual facilities at this source during this Part 70 Permit renewal review process. The applicability determination that follows is based on that conducted for original Part 70 Permit 039-7803-00444; issued on October 12, 1998.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

- (a) The Permittee has indicated that the Glue Operations (FUG26, FUG39, FUG40, and FUG44 & SB-064 through SB-067) and Sealants & Adhesives Usage (Plant-wide) applied to the fiberglass and insulation panels surfaces do not emit particulate. The adhesive is characterized as a stringy material of large "droplet" size, which is not considered particulate per 326 IAC 6-3-1.5(3). The application of adhesive is not considered as *surface coating*, pursuant to 326 IAC 6-3-1.5(5), since there is no potential to emit particulate; therefore 326 IAC 6-3 does not apply to the Glue Operations (FUG26, FUG39,

FUG40, and FUG44 & SB-064 through SB-067, SB-069 and SB-071) and Sealants & Adhesives Usage (Plant-wide). It is noted that there will be no specific compliance monitoring nor preventive maintenance plan requirements applicable to these operations.

- (b) The particulate from the woodworking operations shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 * (0.774)^{0.67} = 3.45 \text{ lbs PM/hour}$$

Based on the above equation, particulate emissions from the woodworking operations shall be limited to 3.45 pounds per hour.

Compliance calculation:

$$(1.16 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.264 \text{ lbs PM/hr}$$

Actual lbs Particulate/hr (0.264) is less than the allowable lbs Particulate/hr (3.45), therefore the woodworking operations will comply with the requirements of 326 IAC 6-3-2. The baghouses shall be in operation at all times the wood working operations are in operation, in order to comply with this limit.

- (c) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following equipment, as insignificant activities:
- (1) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (2) Welding operations with Particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day each unit. (Two (2) stick type welders, identified as FUG41 and FUG42).

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2(d), the Stain Touch Up surface coating operations (FUG45 through FUG49, and SB-068) are exempt from 326 IAC 6-3-2, because less than five (5) gallons of coating is used per day.

326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

Pursuant to Part 70 Operating Permit No. 039-7803-00444, issued on October 12, 1998, the Glue Operation (FUG26, FUG39, FUG40 and FUG44) and Sealant & Adhesive Usage (FUG50, FUG52, and FUG53) were determined to be subject to 326 IAC 8-1-6 (BACT). This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). These operations were constructed in 1992, with additional equipment added in 1993, and each having potential VOC emissions greater than 25 tons per year, therefore this rule applied. However, during the this permit renewal process, it has been determined that the source changed some of the coatings used at the Glue Operation (FUG26, FUG39, FUG40 and FUG44) resulting in potential VOC emissions of less than 25 tons per year. Therefore, the Glue Operation (FUG26, FUG39, FUG40 and FUG44) is no longer subject to

the requirements of 326 IAC 8-1-6 (BACT) as long as the VOC PTE is less than 25 tons per year. However, the Sealant & Adhesive Usage (FUG50, FUG52, and FUG53) still has potential VOC emission well above 25 tons per year, and therefore, shall continue to be subject to the original BACT requirements. IDEM, OAQ determined the following to be BACT requirements for the Sealant & Adhesive Usage (FUG50, FUG52, and FUG53).

- (a) Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage;
- (b) Perform proper equipment clean-up and maintenance. Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;
- (c) The total volatile organic compounds (VOC) input to the plant-wide usage of sealants and adhesives, exclusive of the fiberglass insulation panel gluing operation, shall be limited to less than 29.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month
- (d) The equipment and work practice standards listed in (a) through (c) shall be used at all times of facility operations.

Each of the new surface coating operation (SB-064 through SB-071) added through a Modification (SSM: 039-16779-00444) in March 2003, had less than 25 tons per year of VOC emissions. Therefore, this rule does not apply to surface coating operations SB-064 through SB-071.

326 IAC 8-2-2 (Automobile and light duty truck coating operations)

This source is not subject to this rule because the source does not coat automobiles and light duty truck bodies, hoods, fenders, cargo boxes, doors and grill opening panels.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls shall limit the VOC content of the applied coating to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the manual application process SB-069 which coats metal parts shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm or air dried coatings. Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

The Metal Coating Operation at the source, as an insignificant activity, has actual VOC emissions of less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2-9 do not apply to the source. The source shall maintain records demonstrating its non applicability to this rule.

All other coating and application processes at the facility including SB-064 through SB-068, SB-

070 and SB-071 do not coat metal, and are therefore not subject to this rule.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), facilities constructed after July 1, 1990 located in any county, and with actual VOC emission of greater than fifteen (15) pounds per day before add-on controls, shall apply all coating materials, with the exception of no more than ten (10) gallons of coating per day used for touch up and repair operations, using one or more of the stated application systems.

Each of the Stain Touch Up operations (FUG45 through FUG49 and SB-068) for pre-finished wood cabinet assembly utilizes less than 10 gallons of stain for touch up operation and actual VOC emissions from each facility are less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2-12 do not apply to this facility.

All other coating and application processes at the facility including SB-064 through SB-067, SB-069, SB-070 and SB-071 do not coat wood furniture, and are therefore not subject to this rule.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

Pursuant to 326 IAC 8-4-1 (Applicability) and 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities), all petroleum liquid storage vessels with capacities greater than one hundred fifty thousand (150,000) liters (39,000 gallons) containing VOC whose true vapor pressure is greater than 10.5 kPa (1.52 psi) shall comply with the requirements for external fixed and floating roof tanks and the specified record keeping and reporting requirements. The 500 gallon No. 2 diesel fuel oil storage tank is not subject to the requirements of 326 IAC 8-4-3 since the 500 gallon storage tank is below the 39,000 gallon threshold for rule applicability.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source was constructed after January 1, 1980. Therefore, this rule does not apply to this source.

Testing Requirements

Compliance testing is not required of this source since the coating material usage and related VOC and volatile organic HAP emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation, and the woodworking operations are controlled by baghouse and, along with other processes, have emissions below the relevant allowable particulate matter emission rates.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and

Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

1. The woodworking operation has applicable compliance monitoring conditions as specified below:
 - (a) An inspection shall be performed each calendar quarter of the baghouse controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
 - (b) In the event that bag failure has been observed:
 - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses for the woodworking operation must operate properly to ensure compliance with 326 IAC 6-3 (Process

Operations).

Conclusion

The operation of this stationary towable recreational vehicle manufacturing source shall be subject to the conditions of the attached proposed Part 70 Permit No. T039-16458-00444.

Page 6 of 10 TSD AppA

Company Name: SunnyBrook RV, Inc.
Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540
Permit No.: T039-16458-00444
Reviewer: Adeel Yousuf / EVP
Date: July 22, 2003

[illegible]

Company Name: SunnyBrook RV, Inc.
Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540
Permit No.: T039-16458-00444
Reviewer: Adeel Yousuf / EVP
Date: July 21, 2003

Emission Unit ID	Emission Unit Description	Outlet Grain Loading	Flow Rate	PM Control Efficiency	Potential PM Emission Rate			Allowable PM Emission Process Weight Rate
					Before Controls	After Control	After Control	
		(gr/acf)	acf/min	(%)	(tons/yr)	(tons/yr)	(lb/hr)	(lb/hr)
EU-1	Pin Router SB-001	0.000289	1902.84	99.0%	2.065	0.021	0.0047	85.0
EU-2	12" Tablesaw SB-002	0.000228	2399.1	99.0%	2.054	0.021	0.0047	120.0
EU-3	7x7 Panel Saw	0.00036	190.284	99.0%	0.257	0.003	0.0006	150.0
EU-4	Cut Off Saw SB-004	0.00052	130	95.0%	0.051	0.003	0.0006	100
EU-5	10" Chop Saw	0.0000721	960.04	99.0%	0.260	0.003	0.0006	50
EU-6	10" Radial Chop Saw	0.0000721	960.04	99.0%	0.260	0.003	0.0006	50
EU-7	Hand Router System SB-007	0.00052	130	95.0%	0.051	0.003	0.0006	(1)
EU-8	Hand Router System SB-008	0.00052	130	95.0%	0.051	0.003	0.0006	30
EU-9	Hand Router System SB-009	0.00052	130	95.0%	0.051	0.003	0.0006	15
EU-10	Hand Router System SB-010	0.00052	130	95.0%	0.051	0.003	0.0006	10
EU-11	Hand Router System SB-011	0.00052	130	95.0%	0.051	0.003	0.0006	10
EU-12	Hand Router System SB-012	0.00052	130	95.0%	0.051	0.003	0.0006	(2)
EU-13	Hand Router System SB-013	0.00052	130	95.0%	0.051	0.003	0.0006	20
EU-14	Hand Router System SB-014	0.00052	130	95.0%	0.051	0.003	0.0006	(3)
EU-15	Hand Router System SB-015	0.00052	130	95.0%	0.051	0.003	0.0006	25
SB-059	One (1) Cut Off Saw	0.0005	130	99.0%	0.244	0.002	0.0006	100
SB-060	10" Chip Saw	0.0005	130	99.0%	0.244	0.002	0.0006	50
SB-061	One (1) Table Saw	0.0005	2400	99.0%	4.505	0.045	0.0103	120
SB-062	One (1) Edge Sander	0.0005	1900	99.0%	3.567	0.036	0.0081	25
SB-062	One (1) 7' x 7' Panel Saw	0.0004	1900	99.0%	2.853	0.029	0.0065	150
		Amount of Saw Dust Collected						
FUG25	Cut Off Saw SB-031	0.005	(lb sawdust / hour)	50.0%	0.022	0.011	0.0025	5
FUG27	14" Band Saw SB-033	0.0005	(lb sawdust / hour)	50.0%	0.002	0.001	0.0003	2
FUG28	Chop Saw SB-034	0.005	(lb sawdust / hour)	50.0%	0.022	0.011	0.0025	10
FUG29	14" Mitre Saw SB-035	0.005	(lb sawdust / hour)	50.0%	0.022	0.011	0.0025	10
FUG30	14" Band Saw SB-036	0.0005	(lb sawdust / hour)	50.0%	0.002	0.001	0.0003	2
FUG31	14" Chop Saw SB-037	0.004	(lb sawdust / hour)	50.0%	0.018	0.009	0.0020	15
FUG32	10" Chop Saw SB-038	0.004	(lb sawdust / hour)	50.0%	0.018	0.009	0.0020	30
FUG33	10" Chop Saw SB-039	0.08	(lb sawdust / hour)	50.0%	0.350	0.175	0.0400	85
FUG34	10" Chop Saw SB-040	0.007	(lb sawdust / hour)	50.0%	0.031	0.015	0.0035	50
FUG35	14" Band Saw SB-041	0.0025	(lb sawdust / hour)	50.0%	0.011	0.005	0.0013	10
FUG36	10" Cut Off Saw SB-042	0.08	(lb sawdust / hour)	50.0%	0.350	0.175	0.0400	80
FUG37	14" Chop Saw SB-043	0.125	(lb sawdust / hour)	50.0%	0.548	0.274	0.0625	70
FUG38	14" Chop Saw SB-044	0.125	(lb sawdust / hour)	50.0%	0.548	0.274	0.0625	70
		Total PM Emission Rate:			18.76	1.16		

Methodology:

For Woodworking Operations:

EU-1 to EU-15 and SB-059 to SB-063:

Potential emissions before controls (tons/yr) = (gr / acf) (lb / 7000 gr) (acf / min) (60 min / hr) (8760 hr / yr) (ton / 2000 lb) / (1 - efficiency)

Potential emissions after controls (tons/yr) = Potential Emissions before Control * (1 - efficiency)

FUG25 to FUG38:

Potential emissions before controls (tons/yr) = (lb sawdust / hour) (8760 hr / yr) (ton / 2000 lb)

Potential emissions after controls (tons/yr) = Potential Emissions before Control * (1 - efficiency)

(FUG25 to FUG38 operations are uncontrolled, however, a 50% enclosure efficiency was assumed for the production building)

Notes:

- (1). Total process weight rate going to EU-7 and EU-8 is 30 pounds per hour.
- (2). Total process weight rate going to EU-12 and EU-13 is 20 pounds per hour.
- (3). Total process weight rate going to EU-7 and EU-8 is 25 pounds per hour.

All particulate matter is assumed equal to PM-10.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: SunnyBrook RV, Inc.
Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540
Permit No.: T039-16458-00444
Reviewer: Adeel Yousuf / EVP
Date: July 21, 2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

5.94

52.0

One (1) natural gas fired heater, identified as SB-023, with heat input rating of 0.10 MMBtu/hr

One (1) natural gas fired heater, identified as SB-016, with heat input rating of 0.08 MMBtu/hr

Six (6) natural gas fired heaters, identified as SB-017 through SB-022, each with heat input rating of 0.16 MMBtu/hr

Twelve (12) natural gas fired heaters, identified as SV 25 through SV 29 and SB-024 through SB-030, each with heat input rating of 0.4 MMBtu/hr.

Pollutant						
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.049	0.198	0.016	2.602	0.143	2.185

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Page 4 of 10 TSD App A

Company Name: SunnyBrook RV, Inc.
Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540
Permit No.: T039-16458-00444
Reviewer: Adeel Yousuf / EVP
Date: July 21, 2003

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	e 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.464E-05	3.122E-05	1.951E-03	4.683E-02	8.846E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.301E-05	2.862E-05	3.642E-05	9.887E-06	5.464E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
VOC and Particulate
From Surface Coating Operations and Miscellaneous VOC Usage

Company Name: SunnyBrook RV, Inc.
Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540
Permit No.: T039-16458-00444
Reviewer: Adeel Yousuf / EVP
Date: July 22, 2003

Potential Uncontrolled Emissions:

Coating Material (as applied)	Product Being Coated	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Glue Operation (FUG26,39,40,44)	Fiberglass Insulation																
General Purpose Adhesive	Panels	7.01	30.00%	0.00%	30.00%	0.00%	70.00%	0.831	1.51	2.10	2.10	2.64	63.33	11.56	0.00	3.00	100%
Mineral Spirits		6.47	100.00%	0.00%	100.00%	0.00%	0.00%	0.4	(gal/hr)	6.47	6.47	2.59	62.11	11.34	0.00	0.00	100%
												5.23	125.44	22.89	0.00		
Stain Touch Up of Prefinished Cabinets (FUG45-49)	Wood Cabinets	9.70	74.10%	66.00%	8.10%	65.00%	24.98%	0.01226	1.51	2.24	0.79	0.01	0.35	0.06	0.05	3.15	75%
Miscellaneous Coating Operations																	
General Plant-wide Sealant & Adhesive Usage	Carpeting/Panelling/																
Sikaflex 221 for Misc. Sealing (FUG53)	Plastics/Linoleum/	10.00	9.00%	0.00%	9.00%	0.00%	90.00%	1.6	1.51	0.90	0.90	2.11	50.62	9.24	0.00	1.00	100%
Adhesive in Roof Sealing Operations (FUG52)	Roofing Materials	9.50	40.00%	0.00%	40.00%	0.00%	60.00%	0.75	1.51	3.80	3.80	4.30	103.28	18.85	0.00	6.33	100%
Plastic Pipe Cement (FUG50)		7.08	78.00%	0.00%	78.00%	0.00%	21.00%	0.1022	1.51	5.52	5.52	0.85	20.45	3.73	0.00	26.30	100%
Linoleum Paste	14	(pounds used 2002) /	1776	(2002 oper. hours) =								0.01	0.19	0.03	0.00		
Silicone Sealant	2739	(pounds used 2002) /	1776	(2002 oper. hours) =								1.54	37.01	6.75	0.00		
Dow Corning Silicone Sealant	351	(pounds used 2002) /	1776	(2002 oper. hours) =								0.20	4.74	0.87	0.00		
Adhesive Kanrol	3274	(pounds used 2002) /	1776	(2002 oper. hours) =								1.84	44.24	8.07	0.00		
Geosel Sealant	517	(pounds used 2002) /	1776	(2002 oper. hours) =								0.29	6.99	1.28	0.00		
												11.15	267.53	48.82 *	0.00		
* VOC emissions from the General Plant-wide Sealant & Adhesive Usage shall be limited to less than 29.4 tons per year to satisfy the requirements of 326 IAC 8-1-6 (BACT).																	
Metal Coating	Metal																
Aerosol Touch-Up Paint (Metal Trailer Frames)	370	(pounds used 2002) /	1776	(2002 oper. hours) =								0.21	5.00	0.91	0.00		
Undercoating	13	(pounds used 2002) /	1776	(2002 oper. hours) =								0.01	0.18	0.03	0.00		
Rectorseal Pipe Thread Compound (Metal Pipe)	16	(pounds used 2002) /	1776	(2002 oper. hours) =								0.01	0.22	0.04	0.00		
												0.22	5.39	0.98	0.00		
Solvent Usage																	
Source-wide Clean Up with Mineral Spirits (FUG51)		6.62	100.00%	0.00%	100.00%	0.00%	0.00%	0.581	(gal/hr)	6.62	6.62	3.85	92.31	16.85	0.00	0.00	100%
Miscellaneous Materials Containing VOCs																	
Sikaflex Glass Primer	11	(pounds used 2002) /	1776	(2002 oper. hours) =								0.01	0.15	0.03	0.00		
Glass Cleaner	249	(pounds used 2002) /	1776	(2002 oper. hours) =								0.14	3.36	0.61	0.00		
Silicone Lubricant	233	(pounds used 2002) /	1776	(2002 oper. hours) =								0.13	3.15	0.57	0.00		
												0.28	6.66	1.22	0.00		
Total Uncontrolled Potential Emissions:												20.74	497.84	90.86	0.05		
Total Controlled Potential Emissions:												16.30	391.20	71.40	0.05		

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Total Uncontrolled Potential Emissions = Sum of all coatings applied + Sum of all Solvents Used

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Company Name: SunnyBrook RV, Inc.
Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540
Permit No.: T039-16458-00444
Reviewer: Adeel Yousuf / EVP
Date: July 22, 2003

[illegible]

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

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Company Name: SunnyBrook RV, Inc.
Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540
Permit No.: T039-16458-00444
Reviewer: Adeel Yousuf / EVP
Date: July 22, 2003

Booth ID	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
SB-064 thru 067	Superbond 2001 M	8.3	30.00%	0.0%	30.0%	0.0%	70.00%	0.78000	1.600	2.49	2.49	3.11	74.58	13.61	0.00	3.56	100%
SB-068	WB-202	9.7	75.00%	66.9%	8.1%	0.0%	25.00%	0.01500	1.600	0.79	0.79	0.02	0.45	0.08	0.09	3.14	65%
SB-69	Sekaflex	10.6	4.40%	0.0%	4.4%	0.0%	95.60%	1.89000	1.600	0.47	0.47	1.41	33.85	6.18	0.00	0.49	100%
SB-70	Mineral Spirits	6.62	100.00%	0.0%	100.0%	0.0%	0.00%	0.25000	1.600	6.62	6.62	2.65	63.55	11.60	0.00	#DIV/0!	100%
SB-71	Pipe Adhesive	7.10	80.00%	0.0%	80.0%	0.0%	21.00%	0.12500	1.600	5.68	5.68	1.14	27.26	4.98	0.00	27.05	100%

State Potential Emissions

Add worst case coating to all solvents

8.32

199.70

36.44

0.09

Controlled Potential Emissions

	Material Usage Limitation	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr	
		VOC	PM					
Total Controlled Potential Emissions:	100.00%	0.00%	0.00%	8.32	199.70	36.44	0.09	

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Sum of worst case coatings in each booth

Company Name: SunnyBrook RV, Inc.
Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540
Permit No.: T039-16458-00444
Reviewer: Adeel Yousuf / EVP
Date: July 22, 2003

Material	Booth ID	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Hexane	Weight % Toluene	Weight % Ethylene Glycol	Weight % Xylene	Weight % Ethyl Benzene	Weight % MEK	Hexane Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Emissions (ton/yr)	Xylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MEK Emissions (ton/yr)	Total
Superbond 2001 M	SB-064 thru 067	8.3	0.78000	1.600	15.00%	15.00%	0.00%	0.00%	0.00%	0.00%	6.81	6.81	0.00	0.00	0.00	0.00	13.61
WB-202	SB-068	9.7	0.01500	1.600	0.00%	0.00%	5.10%	0.00%	0.00%	0.00%	0.00	0.00	0.05	0.00	0.00	0.00	0.05
Sekaflex	SB-69	10.6	1.89000	1.600	0.00%	0.00%	0.00%	3.74%	0.66%	0.00%	0.00	0.00	0.00	5.25	0.93	0.00	6.18
Mineral Spirits	SB-70	6.62	0.25000	1.600	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pipe Adhesive	SB-71	7.10	0.12500	1.600	0.00%	0.00%	0.00%	0.00%	0.00%	80.00%	0.00	0.00	0.00	0.00	0.00	4.98	4.98
Total Uncontrolled Potential Emissions											6.81	6.81	0.05	5.25	0.93	4.98	24.82

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Welding and Thermal Cutting

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Company Name: SunnyBrook RV, Inc.
 Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540
 Permit No.: T039-16458-00444
 Reviewer: Adeel Yousuf / EVP
 Date: July 21, 2003

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Stick (FUG-41)	1	0.03125		0.037	0.003	0.00	0.00	0.001	0.000	0.00	0.00	0.000
Stick (FUG-42)	1	0.03125		0.037	0.003	0.00	0.00	0.001	0.000	0.00	0.00	0.000
EMISSION TOTALS								PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								0.00	0.00	0.00	0.00	0.00
Potential Emissions lbs/day								0.06	0.00	0.00	0.00	0.00
Potential Emissions tons/year								0.01	0.00	0.00	0.00	0.00

METHODOLGY

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

**Appendix A: Emission Calculations
Insignificant Activities**

Page 10 of 10 TSD App A

Company Name: SunnyBrook RV, Inc.
Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540
Permit No.: T039-16458-00444
Reviewer: Adeel Yousuf / EVP
Date: July 21, 2003

Miscellaneous clean-up operations (Fugitive Emissions)

VOC Emissions

Pollutant	Chemical	Maximum Usage (lb/yr)	Weight Percent VOC (%)	Potential emission rate (TPY)
VOC	Permagrip 670	10950.000	82.00%	4.490
VOC	Pemco Sealant	13315.200	37.00%	2.463
VOC	ReactorSeal TRU-BLU	53.793	20.00%	0.005
			Total VOC	6.958

HAPs Emissions

Pollutant	Chemical	Maximum Usage (lb/yr)	Weight Percent (%)	Potential emission rate per wet machine (TPY)
Toluene	Pemco Sealant	13315.000	37.00%	2.463
			Total HAPs	2.463

METHODOLOGY

Emissions are based on material balance. Maximum material usage and VOC contents are provided by the source; 100% emission is assumed.

Potential Emissions, lbs/hr = Max. Rate (lb/hr) x VOC content (%)

Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.